## MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

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By ECF

Honorable John G. Koeltl United States District Judge Southern District of New York 500 Pearl Street, Courtroom 12B New York, NY 10007 APPLICATION GRANTED SO ORDERED

John G. Koeltl, U.S.D.J.

Re:

United States v. Asim Hameedi, et al., 17 Cr. 137 (JGK)

Dear Judge Koeltl:

I write on behalf of my client, Desiree Scott to respectfully request a modification of her bail conditions to allow her to (1) travel to Jamaica with her family for vacation beginning on August 28, 2022 and returning on September 2, 2022, and (2) to renew her passport once permission to travel is granted. Ms. Scott will provide to Pretrial the details of her travel to Jamaica at a later date, and she will return the new passport to Pretrial upon returning from Jamaica.

On March 29, 2022, this Court granted Ms. Scott's request to temporarily receive her expired passport from Pretrial and to use it to apply for a new passport. ECF No. 529. Ms. Scott received her expired passport from Pretrial and applied for a new passport on April 8, 2022. Earlier this month, Ms. Scott received a letter from Passport Services of the Bureau of Consular Affairs in the Department of State that her application for a U.S. passport had been denied pursuant to 22 C.F.R. § 51.60(b)(2) based on this Court's March 1, 2017 order placing Ms. Scott under the supervision of Pretrial Services and prohibiting travel outside of the Southern and Eastern Districts of New York without the Court's permission. The letter indicated that Ms. Scott may reapply for renewal of her passport once she has received permission from the Court to travel.

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Neither the Government nor Pretrial has any objection to this request. Thank you for the Court's consideration of this letter motion.

Respectfully submitted,

/s/ Kathleen E. Cassidy
Kathleen E. Cassidy
Attorney for Desiree Scott

cc: AUSAs Michael Neff and David Abramowicz (via ECF)
Office Shannon Finneran, Pretrial Services (by email)